

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO ALL CASES

NOTICE OF ORAL AND VIDEOTAPED DEPOSITION DUCES TECUM
OF LAURA ANGELINI

To: Defendant ETHICON, LLC and its Attorneys of Record

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure that Plaintiffs, by and through their counsel, will take the videotaped deposition of Laura Angelini on December 10th, 2014 at Marks Gray, P.A., 1200 Riverplace Boulevard, Suite 800, Jacksonville, FL 32207, at 8:00 am EST. This deposition is being taken for the purposes of discovery and such other purposes as authorized by law. The deposition will be taken before a person authorized by law to administer oaths, pursuant to Federal Rule of Civil Procedure 28, and shall continue from day to day until completed. Said deponent will bring the documents referred to in Schedule A attached hereto.

Respectfully submitted,

/s/ Thomas P. Cartmell
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SCHEDULE A

1. All letters, e-mails, telecopies or other documents (including any attachments thereto) reflecting any communication that relates to this litigation and that was exchanged between Defendant manufacturers or any attorneys for or other agents for Defendants to the extent not already produced.
2. A copy of your current curriculum vitae.
3. All documents relied upon by the deponent in preparing for this deposition.
4. A copy of the personnel file and/or employment file for the deponent.
1. All documents relating to the TTVT products that are in the deponent's personal possession, meaning documents stored or maintained in the deponent's dwelling, home, garage, or any other property owned, rented, leased, maintained or lived in by defendant as well as any documents or electronic media related to the TTVT or pelvic floor products which are stored or maintained on the deponent's personal property including but not limited to, personal computers, cell phones, flash drives, or any portable storage media device.
2. All documents, notes, videos, or other information relating to TTVT or pelvic floor products that the deponent sponsored, supported, edited, posted, and/or linked websites, FaceBook pages, MySpace pages, Twitter pages, Wikipedia, or pages on any other websites.

CERTIFICATE OF SERVICE

I certify that on November 19, 2014, I electronically filed this document with the Clerk of the Court using the CM/ECF system which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

Certified to the 19th day of November by:

/s/ Thomas P. Cartmell
THOMAS P. CARTMELL